

Law Offices of
JAMES E. BAHAMONDE, P.C.

2501 Jody Court
North Bellmore, NY 11710
Long Island City, NY 11101
New York City
James@C

Application granted. The time to move to reopen is
extended to December 1, 2022.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
November 7, 2022

BY ECF

Honorable Philip Halpern
Southern District of New York
300 Quarropas St.
White Plains, NY 10601

**Re. *Rance, et al v. Jefferson Village Condominium No. 5, et al*
18cv6923 (NSR)(JCM)**

Dear Judge Halpern:

Plaintiffs seek leave to restore the action or, in the alternative, an extension of time to file the Stipulation of Settlement. This is parties' sixth request for an extension of time. Defendants consent to the request for an extension of time.

On September 29, 2022, the Court extended parties' time to file the Stipulation of Settlement to November 7, 2022.

As previously stated, parties have agreed on the remedial measures as well as the amount of damages and attorney's fees and costs. After nearly 2 months, Defendants' attorneys finally met to discuss their most recent revisions to the proposed settlement agreement. Parties' attorneys are now communicating with our clients to ascertain if they will accept the most recent revisions.

As such, because parties have not finished their settlement negotiations, I respectfully request an extension of time to file a Stipulation of Settlement until December 1, 2022, or in the alternative, to restore the action.

I thank the Court for its time and consideration of this request.

Respectfully,

/s/ James E. Bahamonde

**Law Office of
James E. Bahamonde, P.C.**

November 4, 2022
Page - 2 -

James E. Bahamonde, Esq.

cc:

Eric J Sauter, Esq.

James Marshall, Esq.

Wilson Elser, Moskowitz, Edelman & Decker, LLP
Attorneys for Defendants